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Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11

(Lead Case)
(Jointly Administered)

**SIXTH AMENDED VERIFIED
STATEMENT OF THE AD HOC GROUP
OF SUBROGATION CLAIM HOLDERS
PURSUANT TO BANKRUPTCY RULE
2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”), the ad hoc group of subrogation claim holders (“**Ad Hoc Subrogation Group**”), who hold liquidated and unliquidated insurance subrogation claims¹ against PG&E Corporation and Pacific Gas and Electric Company (“**Debtors**”), relating to certain California wildfires (“**Wildfires**”) (and other claims as detailed below), by and through its undersigned counsel, and due to changes in group membership or holdings, hereby submit this sixth amended verified statement (“**Sixth Amended Verified Statement**”), and in support thereof, state as follows:

1. On or around January 23, 2019, the Ad Hoc Subrogation Group engaged Willkie Farr & Gallagher LLP (“**Willkie**”) to represent it in connection with the Debtors’ restructuring. On March 20, 2019, the Ad Hoc Subrogation Group filed the *Verified Statement of the Ad Hoc Group of Subrogation Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 971] (“**Original Verified Statement**”). On April 17, 2019, the Ad Hoc Subrogation Group filed the *First Amended Verified Statement of the Ad Hoc Group of Subrogation Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 1482] (“**First Amended Verified Statement**”), which amended and replaced the Original Verified Statement. On July 3, 2019, the Ad Hoc Subrogation Group filed the *Second Amended Verified Statement of the Ad Hoc Group of Subrogation Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 2862] (“**Second Amended Verified Statement**”), which amended and replaced the First Amended Verified Statement. On July 17, 2019, the Ad Hoc Subrogation Group filed the *Third Amended Verified Statement of the Ad Hoc Group of Subrogation Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 3020] (“**Third Amended Verified Statement**”), which amended

¹ The term “Subrogation Claims” refers broadly to any claims arising from or related to payments made by an insurer to or on behalf of parties insured under policies issued by such insurer who have or had claims against the Debtors or a Debtor relating to the insured loss on account of which such insurer payments were made (hereinafter, “**Tort Victims**”). The use of the shorthand descriptive term “subrogation” herein is not intended to modify or limit the substantive rights of the holder of these claims or the bases for the claimant’s right to assert claims originating with insured Tort Victims. These “subrogation” claims include, but are not limited to, claims that arise from subrogation (whether such subrogation is contractual, equitable or statutory), assignment (whether such assignment is contractual, equitable or statutory), or otherwise in connection with payments made or to be made by the applicable insurer to insured Tort Victims, and whether arising as a matter of State or federal law, including, without limitation, Section 509 of the Bankruptcy Code. The holder of these claims reserves its rights to assert any and all claims arising from, as a result of, or in connection with payments made or to be made by the claimant (or, where the claimant is the direct or indirect assignee of claims of an insurer, the applicable insurer (the “**Assignor Insurer**”)) to or on behalf of each tort victim insured by the claimant or by the Assignor Insurer, and to assert all such claims both cumulatively and in the alternative.

1 and replaced the Second Amended Verified Statement. On October 16, 2019, the Ad Hoc
2 Subrogation Group filed the *Fourth Amended Verified Statement of the Ad Hoc Group of Subrogation*
3 *Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 4228] (“**Fourth Amended Verified**
4 **Statement**”), which amended and replaced the Third Amended Verified Statement. On October 18,
5 2019, the Ad Hoc Subrogation Group filed the *Fifth Amended Verified Statement of the Ad Hoc*
6 *Group of Subrogation Claim Holders Pursuant to Bankruptcy Rule 2019* [Dkt. No. 4302] (“**Fifth**
7 **Amended Verified Statement**”), which amended and replaced the Fourth Amended Verified
8 Statement. This Sixth Amended Verified Statement amends and replaces the Fifth Amended Verified
9 Statement.

10 2. As of the date of this Sixth Amended Verified Statement, Willkie represents only the
11 Ad Hoc Subrogation Group. Willkie does not represent or purport to represent any other entities in
12 connection with the Debtors’ chapter 11 cases. Each member of the Ad Hoc Subrogation Group is
13 aware of, and has consented to, Willkie’s “group representation” of the Ad Hoc Subrogation Group.
14 No member of the Ad Hoc Subrogation Group represents or purports to represent any other entities
15 in connection with these chapter 11 cases.

16 3. Attached hereto as **Exhibit A** is a list of the names and addresses of each member of
17 the Ad Hoc Subrogation Group, as well as the amount of each member’s disclosable economic
18 interests (as relayed to Willkie by each member). The information contained in Exhibit A is based
19 upon information provided by such members to Willkie and is subject to change.

20 4. The members of the Ad Hoc Subrogation Group either hold disclosable economic
21 interests, or act as investment advisors or managers to funds and/or accounts or their respective
22 subsidiaries that hold disclosable economic interests relating to the Debtors. In accordance with
23 Bankruptcy Rule 2019 and based upon the most recent information provided to Willkie by each
24 member of the Ad Hoc Subrogation Group, attached hereto as **Exhibit A** is a list of the names,
25 addresses and nature and amount of each disclosable economic interest of each present member of
26 the Ad Hoc Subrogation Group.

27 5. The information set forth in Exhibit A is intended only to comply with Bankruptcy
28

1 Rule 2019 and is not intended for any other purpose.² Willkie does not make any representation
2 regarding the validity, amount, allowance, or priority of such economic interests and reserves all
3 rights with respect thereto.

4 6. Nothing contained in this Sixth Amended Verified Statement (or Exhibit A) should be
5 construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Subrogation
6 Group to assert, file and/or amend their claims in accordance with applicable law and any orders
7 entered in these chapter 11 cases.

8 7. Willkie reserves the right to amend and/or supplement this Sixth Amended Verified
9 Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

28 ² For the avoidance of doubt, no implication should be drawn to the extent amounts set forth on Exhibit A are
inconsistent with the amounts set forth in the proof of claims filed by individual members of the Ad Hoc Subrogation
Group.

1 Dated: February 26, 2020

2 **WILLKIE FARR & GALLAGHER LLP**

3 /s/ Matthew A. Feldman

4 Matthew A. Feldman (*pro hac vice*)

5 Joseph G. Minias (*pro hac vice*)

6 Benjamin P. McCallen (*pro hac vice*)

7 Daniel I. Forman (*pro hac vice*)

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23 Email: kdiemer@diemerwei.com

24 *Counsel to Ad Hoc Group of Subrogation Claim Holders*

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
AIG Europe Limited	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$112,404.50	
Allstate Insurance Company and certain affiliates	2775 Sanders Road, Suite A2E Northbrook, IL 60062	\$864,721,862.55	\$6,000,000.00 in Senior Notes ²
Alternative Insurance Corporation	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$235,035.80	
American National Property & Casualty Company DBA ANPAC	1949 E. Sunshine Springfield, MO 65899	\$4,982,189.43	
American Guarantee and Liability Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	TBD ³	

¹ Amounts listed herein are on account of claims paid to underlying insured parties affected by various California wildfires. Every member of the Ad Hoc Subrogation Group holds additional claims against the Debtors based on undisclosed internal reserves and future unknown amounts that have neither been paid or reserved for.

² “Senior Notes” shall have the meaning ascribed to it in the *Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief* [Dkt. No. 263].

³ Where a party’s only wildfire related subrogation claims is listed as “TBD”, such party’s claims are based on undisclosed internal reserve amounts.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Certain affiliates of American International Group, Inc. (“AIG”) ⁴	175 Water Street New York, NY 10038	\$333,299,328.37	
American Modern Insurance Group	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$198,558.45	
American National Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$15,680.88	
Amica Mutual Insurance Company	100 Amica Way Lincoln, RI 02865	\$35,014,454.00	
AmTrust North America	P.O. Box 650872 Dallas, TX 75265	\$10,041,883.62	
AmTrust Syndicate 1206	1 Great Tower Street London EC3R 5AA	\$5,910,000.00	
Arch Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$11,240.45	
American Reliable Insurance Company	P.O. Box 6099 Scottsdale, AZ 85261	\$11,075,372.63	

⁴ Members of the Ad Hoc Subrogation Group include: AIG Europe Limited; AIG Property Casualty Company; AIG Specialty Insurance Company; American Home Assurance Company; Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; and New Hampshire Insurance Company.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
ArgoGlobal London	c/o Peninsula Insurance Bureau 2832 Lent Road Apopka, FL 32712	\$2,317,000.42	
ASI Select Insurance Corp.	1 ASI Way N St. Petersburg, FL 33702	\$14,167,681.01	
Aspen Insurance	155 Federal Street, Suite 602 Boston, MA 02110	\$5,744,634.75	
Aspen Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$1,601,164.38	
“Assurant” Group of Carriers ⁵	260 Interstate North Circle SE Atlanta, GA 30339	\$8,550,064.48	
Attestor Capital LLP	7 Seymour Street, Fourth Floor London, XO W1H 7JW	\$834,742,084.00 ⁶	7,488,514 shares of PG&E Corporation Common Stock \$20,500,000.00 in Senior Notes

⁵ Members of the Ad Hoc Subrogation Group include: American Bankers Insurance Company; American Bankers Insurance Company of Florida; American Security Insurance Company; Standard Guaranty Insurance Company; Voyager Indemnity Insurance Company.

⁶ Includes indirect exposure to subrogation claims, which provide economic interest to the subrogation claims arising from payments made (or to be made) by insurers to underlying insured parties affected by various California wildfires.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS ¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
The Baupost Group, L.L.C. ⁷	10 St. James Avenue Suite 1700 Boston, Massachusetts 02116	\$6,779,029,346.01 ^{8 9 10}	16,062,643 shares of PG&E Corporation Common Stock \$850,000.00 in other unsecured wildfire- related claims \$33,691,700.00 in other rights ¹¹
Berkley National Insurance Company	222 South 9th Street, Suite 2700 Minneapolis, MN 55402	\$5,074,959.96	
Berkley Regional Insurance Company	222 South 9th Street, Suite 2700 Minneapolis, MN 55402	\$99,226.51	
Berkshire Hathaway Guard Ins.	P.O. Box 1368 Wilkes Barre, PA 18703	\$5,298,837.50	

⁷ Disclosed information reflects funds and investment vehicles controlled by The Baupost Group, L.L.C. and includes indirect exposure by such funds and investment vehicles to subrogation claims that are subject to purchase arrangements of another entity.

⁸ The amounts reflected herein are based on information received from the insurers who were the original holders of these claims and who have made or will make payments to their respective insured policyholders that give rise to, or are otherwise related to, these claims. The Baupost Group L.L.C. has not independently verified such information which remains subject to change based on information subsequently received. The Baupost Group L.L.C. expressly reserves the right to amend or modify the information set forth in this Bankruptcy Rule 2019 Statement, whether based on information that is subsequently received, or for any other reason.

⁹ \$3,461,051,575.95 of the claims included in the above amount are subject to a potential right of payment to a contractual counterparty, the value of which depends on the value of such claims.

¹⁰ A contractual counterparty from whom claims were acquired has a right to a certain specified type of recovery that might be received with respect to the acquired claims to the extent, if any, that such specified type of recovery is received. Further, a contractual counterparty to which claims were transferred is obligated to pay over a certain specified type of recovery that might be received with respect to the claims transferred to such contractual counterparty to the extent, if any, that such specified type of recovery is received by such counterparty.

¹¹ Represents membership interest in a Delaware limited liability company that holds contractual rights arising out of an indirect economic exposure to subrogation rights.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Berkshire Hathaway Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$722,900.00	
Brit Global Specialty	The Leadenhall Building 122 Leadenhall Street London EC3V 4AB	\$25,864,880.25	
California Casualty Indemnity Exchange	1875 S. Grant Street, Ste. 800 P.O. Box M San Mateo, CA 94402	\$44,534,274.67	
California Fair Plan Association	3425 Wilshire Boulevard, Suite 1200 Los Angeles CA 90010	\$40,668,908.36	
California Insurance Guarantee Association	101 North Brand Boulevard, 6th Floor Glendale, CA 91203 P.O. Box 29066 Glendale, CA 91209	\$69,984,665.00	
California Mutual Insurance Company	650 San Benito Street Ste. 250 Hollister, CA 95023	\$4,068,507.04	
Canopus Managing Agents Limited		\$3,025,614.84	
Century National	P.O. Box 628 Cypress, CA 90630	\$1,680,196.11	

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Certain Underwriters at Lloyds (Novae)		\$6,457,579.00	
Certain Underwriters at Lloyds (Atrium)		\$14,243,608.00	
Certain Underwriters at Lloyd's, London-Brit Synd. 2987 & 2988		\$90,847.00	
Chubb Group ¹²	436 Walnut Street, 4th Floor Philadelphia, PA 19106	\$34,754,998.00	\$1,025,000.00 in Senior Notes Insurance policies: unliquidated and contingent ¹³
Church Mutual Insurance	PO Box 342 Merrill, WI 54452	\$18,440,546.12	
CNA Insurance Company ¹⁴	801 West Warrenville Road, Ste 700 Lisle, IL 60532	\$56,468,447.83	
Continental Casualty Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$350,000.00	

¹² Members of the Ad Hoc Subrogation Group include: Bankers Standard Insurance Company; Chubb Custom Insurance Company; Chubb Insurance Company of New Jersey; Chubb National Insurance Company; Federal Insurance Company; Great Northern Insurance Company; Illinois Union Insurance Company; Indemnity Insurance Company of North America; Pacific Indemnity Company; Vigilant Insurance Company; Westchester Fire Insurance Company (Apa); and ACE American Insurance Company (collectively, the “**Chubb Group**”).

¹³ Certain Chubb entities are party to various insurance policies and agreements with PG&E and its affiliates.

¹⁴ Members of the Ad Hoc Subrogation Group include: American Casualty Company; Continental Casualty Company; Continental Insurance Company; National Fire Insurance Company of Hartford; Transportation Insurance Company; Valley Forge Insurance Company

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Crestmont Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$1,000,000.00	
Crusader Insurance Company	26050 Mureau Road Calabasas, CA 91302-3171	\$423,717.00	
The Dentists Insurance Company	1201 K Street Sacramento, CA 95814	\$6,701,480.86	
Employers Mutual Casualty Company	717 Mulberry Des Moines, IA 50306 P.O. Box 712 Des Moines, IA 50306	\$511,797.91	
Endurance American Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$150,000.00	
Endurance Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$16,860.68	
Essentia Ins. Co.	141 Rivers Edge Dr. Ste 200 Traverse City, MI 49684	\$12,170,743.45	
Everest Indemnity Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$363,185.10	

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NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Everest National Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$3,000,000.00	
Fairfax Co / Riverstone; MS Amlin	No. 2 Minster Ct. Mincing Ln., London, UK 122 Leadenhall St London, UK	\$1,106,637.33	
Certain affiliates of Farmers Insurance Exchange	6301 Owensmouth Woodland Hills, CA 91367	\$53,014,504.14	
Federated Insurance	P.O. Box 486 Owatonna, MN 55060	\$1,758,448.24	
First Specialty Insurance Corporation	1200 Main Street Kansas City, MO 64105	\$19,821,944.34	
GCube Insurance Services, Inc.	100 Bayview Circle, Ste. 505 Newport Beach, CA 92660	\$3,459,010.39	
General Security Indemnity Company of Arizona	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$6,849,746.71	
Generali U.S. Branch	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$22,480.90	
Grange Insurance Association	200 Cedar St. Seattle, WA 98121	\$42,263,476.67	

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Great American Insurance Company and certain affiliates ¹⁵	Great American Insurance Group P.O. Box 5425 Cincinnati, OH 45201-5425	\$104,145,756.96	
Great Lakes Reinsurance (UK) SE		\$726,937.00	
Government Employees Insurance Company and certain affiliates	5260 Western Avenue Chevy Chase, MD 20815	\$11,276,719.68	
GuideOne Insurance	PO Box 14543 Des Moines, IA 50306-3543	\$6,430,911.42	
The Hanover Insurance Group	440 Lincoln Street Worcester, MA 01653	\$19,196,114.00	
Hartford Accident & Indemnity Company and certain affiliates ¹⁶	1 Hartford Plaza, Hartford, CT 06155	\$368,179,659.27	
HDI Global SE	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$12,000,000.00	
Horace Mann Insurance Company	3701 Regent BLVD, Suite 300 Irving, TX 15063	\$137,741,142.99	

¹⁵ Members of the Ad Hoc Subrogation Group include: Great American Spirit Insurance Company; Great American Assurance Company; Great American Alliance Insurance Company; Great American Insurance Company; Great American Insurance Company of New York; and Great American E&S Insurance Company.

¹⁶ Members of the Ad Hoc Subrogation Group include: Hartford Casualty Insurance Company; Hartford Fire Insurance Company; Hartford Underwriters Insurance Company; Property & Casualty Ins. Company of Hartford; Sentinel Insurance Company Ltd.; Trumbull Insurance Company; and Twin City Fire Insurance Company.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
International Insurance Company of Hannover SE	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$44,961.80	
Ironshore Insurance Ltd.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$713,186.34	
Ironshore Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$22,480.90	
KBIC Insurance Company	55 Challenger Road, Suite 302 Ridgefield Park, NJ 07660	\$1,304,991.34	
Kemper Auto Alliance United	8260 LBJ Freeway, Suite 400 Dallas, Texas 75243	\$26,348,619.34	
Landmark American Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$213,186.34	
Certain Affiliates of Liberty Mutual Insurance Company (“ <u>Liberty</u> ”)	175 Berkeley Street Boston, MA 02117	\$764,108,588.56	\$122,860,717.00 in surety bonds, unliquidated and contingent ¹⁷ Insurance policies: unliquidated and contingent ¹⁸

¹⁷ Liberty continues to write new bonds in the ordinary course of business post-petition.

¹⁸ Liberty is party to various surety bonds, insurance policies and related agreements with PG&E and its affiliates.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Certain Underwriters of Lloyd's of London, UK Subscribing to Certain Policies ¹⁹	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$21,325,851.00	
Certain Underwriters at Lloyd's London Subscribing to Policy No. HTB-002381-002 c/o Raphael and Associates	301 Route 17 North, Suite 401 Rutherford, NJ 07070	\$7,498,230.85	
Certain Underwriters at Lloyd's London Subscribing to Policy No. SS0001818/0196 c/o Raphael and Associates	301 Route 17 North, Suite 401 Rutherford, NJ 07070	\$1,106,637.33	
Lloyds of London Novae 2007 Syndicate	777 Main St. Fort Worth, TX 76102	\$903,745.13	
Mapfre USA	11 Gore Road Webster, MA 01570	\$9,835,094.66	
Markel Service, Incorporated ²⁰	4521 Highwoods Parkway Glen Allen, VA 23060	\$26,706,285.00	

¹⁹ Members of the Ad Hoc Subrogation Group include underwriters to policy numbers: 10492-04, 10942-01, 16463W18, B0507L16360-521, B1230AP56189A17, B1230AP01428A18-16247, B128415509W18, B1353DG1700356000, B57635DAA, H3X000266, H3X000540, H3X000606, H3X000642, H3X000697, H3X000826, H3X000910, LSI100402-05, LSI100966-04, LSI103618-01, N17NA10020, P17A1770A001, PG1700158, PIV105114, PIV105143, PIV105626, PIV105719, PIV106514, PIV106864, PIV110301, PIV119634, PLNMBLV00001318, PN1600673AGA, PN1700079, PN1700089, PN1700157, PN1700364, PRPNA1701511, PSLPL106107, PTNAM1701507, PTNAM1701688, PTNAM1802877, PTNAM1802878, PTNAM1802879, PTNAM1802896, W1D52B160101, and W1DC80180201.

²⁰ On behalf of its affiliated insurers, Evanston Insurance Company, Markel American Insurance Company, and Markel Insurance Company.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Maxum Indemnity Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$106,593.17	
Maxum Specialty Insurance Group	3655 North Point Parkway Suite 600 Alpharetta, GA 30005	\$182,487.62	
Mercury Insurance and certain affiliates	555 W. Imperial Highway Brea, CA 92821	\$63,489,833.00	
Metropolitan Direct Property & Casualty	500 MetLife Way Freeport, IL 61032	\$732,674.45	
National Fire & Marine Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	TBD	
Nationwide Mutual Insurance Company and certain affiliates	One Nationwide Plaza, Columbus, Ohio 43215	\$9,928,797.02	
Nautilus Insurance Company	600 Las Colinas Blvd., Ste. 1400 Irving, TX 75039	\$676,101.56	
Nonprofits Insurance Alliance	P.O. Box 8507 Santa Cruz, CA 95061-8507	\$12,761,206.94	
OneBeacon / Atlantic Specialty Ins. Co.	188 Inverness Dr. West, Ste. 600 Englewood, CO 80112	\$481,548.24	

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Oregon Mutual Insurance Company	PO Box 808 McMinnville, Oregon 97128	\$4,475,131.85	\$140.88 derivative interest in Pacific Gas and Electric Company Preferred Stock
Pacific Specialty Insurance Co.	2200 Geng Road Palo Alto, CA 94303	\$45,259,283.34	
Pharmacists Mutual Insurance Company	P.O. Box 360, Algona, Iowa 50511	\$1,204,001.44	
Philadelphia Indemnity Insurance Company	One Bala Plaza, Suite 100 Bala Cynwyd, PA 19004	\$22,785,967.27	
The Princeton Excess and Surplus Lines Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$290,848.35	
The Progressive Corporation	6300 Wilson Mills Road Mayfield Village, OH 44143	\$11,852,398.08	63,500 shares of PG&E Corporation Common Stock
PURE Insurance	44 S. Broadway, Suite 301 White Plains, NY 10601	\$10,545,017.55	
QBE Americas, Inc.	One QBE Way Sun Prairie, WI 53596	\$80,403,727.00	
Rite Aid Corporation and Thrifty Payless, Inc.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$2,750,000.00	
RSA Insurance Co PLC	20 Fenchurch St. London EC3M 3AV	£6,481,751.56	
RSUI Group, Inc.	945 East Paces Ferry Road, Suite 1800 Atlanta, GA 30326	\$60,715.56	

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
RSUI Indemnity Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	TBD	
Selective Insurance Company of America; Mesa Underwriters Specialty Insurance Company	40 Wantage Ave. Branchville, NJ 07826	\$1,188,619.06	
Sentry Select Insurance Company	P.O. Box #8043 Stevens Point, WI 54481	TBD	
Star Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$15,419.67	
Starr Surplus Lines Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$745,392.18	
Starr Technical Risks	5151 San Felipe Suite #200 Houston, TX 77056	\$551,747.66	
State Farm Mutual Automobile Insurance Company and certain affiliates	One State Farm Plaza Bloomington, IL 61710	\$2,514,705,805.00	\$86,000,000.00 in Senior Notes \$5,000,000.00 in Non-Wildfire Subrogation Claims \$530,000.00 in Contractual Obligations under Prepetition Settlement Agreement
Stillwater Insurance Group	12500 I St., Ste. 100 Omaha, NE 68137	\$10,465,827.32	

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS ¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Strategic Value Partners, LLC acting strictly as agent on behalf of its managed funds and accounts	100 West Putnam Ave Greenwich, CT 06830	\$132,030,617.58	\$118,250,000.00 in Senior Notes \$15,000,000.00 in Revolving Credit Facility principal ²¹
Sutter Insurance Company	1301 Redwood Way, Suite 200 Petaluma, CA 94954	\$838,200.00	
Tokio Marine American Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$14,224.00	
TOPA Insurance Co.	24025 Park Sorrento, Suite 300 Calabasas, CA 91302	\$621,000.00	
Sixth Street Partners, LLC ²²	2100 McKinney Ave., Suite 1500 Dallas, TX 75201	\$851,789,253.59 ²³	1,000,000 shares of PG&E Corporation Common Stock \$152,124,000.00 in Senior Notes \$9,884,083.91 in Revolving Credit Facility principal

²¹ “Revolving Credit Facility” shall have the meaning ascribed to it in the *Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief* [Dkt. No. 263].

²² Disclosed information reflects funds and investment vehicles controlled by affiliates of Sixth Street Partners LLC (formerly known as TPG Sixth Street Partners, LLC).

²³ The amounts reflected herein are based on information received from the insurers who hold legal title to and issued the policies relating to these claims, and who have made or will make payments to their respective insured policyholders that give rise to, or are otherwise related to, these claims. Sixth Street Partners, LLC has not independently verified such information which remains subject to change based on information subsequently received. Sixth Street Partners, LLC expressly reserves the right to amend or modify the information set forth in this Bankruptcy Rule 2019 Statement, whether based on information that is subsequently received, or for any other reason. In addition, a party from whom certain claims were acquired has a right to a certain specified type of recovery that might be received with respect to the acquired claims to the extent, if any, that such specified type of recovery is received, and an affiliate of Sixth Street Partners, LLC is obligated to pay over such recovery to the extent, if any, it is received.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
The Travelers Indemnity Company and certain of its property casualty insurance affiliates ²⁴	1 Tower Square, 0000-08MS Hartford, CT 06183	\$831,269,291.00	\$41,859,070.47 in Senior Notes \$3,820,435.66 in non-Wildfire Subrogation Claims
TWE Insurance Company Pte. Ltd.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$3,641,450.00	
Certain affiliates of United Services Automobile Association ²⁵	9800 Fredericksburg San Antonio, TX 78288	\$532,829,646.00	\$20,000,000.00 in Senior Notes \$38,000 in other claims
United Specialty Insurance Company	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$1,518,656.34	
United States Liability Insurance Company	1190 Devon Park Drive Wayne, PA 19087	\$540,362.12	
Tudor Insurance Company and certain affiliates ²⁶	300 Kimball Drive, Suite 500 Parsippany NJ 07054	\$4,027,917.23	

²⁴ Members of the Ad Hoc Subrogation Group include: Travelers Casualty Insurance Company of America; Travelers Indemnity Company of Connecticut; Travelers Property Casualty Company of America; The Travelers Indemnity Company of America; St Paul Fire and Marine, The Travelers Indemnity Company; Travelers Commercial Insurance Company; The Standard Fire Insurance Company; The Travelers Home and Marine Insurance Company; Travelers Property Casualty Insurance Company; Fidelity and Guaranty Insurance Underwriters Inc.; The Northfield Insurance Company; Northland Insurance; Constitution State Services, LLC.

²⁵ Members of the Ad Hoc Subrogation Group include: United Services Automobile Association; USAA Casualty Insurance Company; USAA General Indemnity Company; Garrison Property and Casualty Company, and affiliates companies.

²⁶ Members of the Ad Hoc Subrogation Group include: Western World Insurance Company.

Exhibit A

NAME	ADDRESS	WILDFIRE RELATED SUBROGATION CLAIMS¹	OTHER DISCLOSABLE ECONOMIC INTERESTS
Wawanesa General Insurance Co.	9050 Friars Rd. San Diego, CA 92108	\$1,926,522.57	
Western World Insurance Company	300 Kimball Drive, Suite 500 Parsippany NJ 07054	\$540,262.06	
XL America Insurance, Inc.	c/o Denenberg Tuffley, PLLC 28411 Northwestern Hwy, Suite 600 Southfield, MI 48034	\$13,084,303.38	
Zenith Insurance Company	P.O. Box 619083 Roseville, CA 95661-9083	\$3,987,318.25	
Zurich American Insurance Company	1299 Zurich Way Schaumburg, IL 60196	\$66,012,437.33	